

Exhibit U



COURT REPORTING

LEGAL VIDEOGRAPHY

VIDEOCONFERENCING

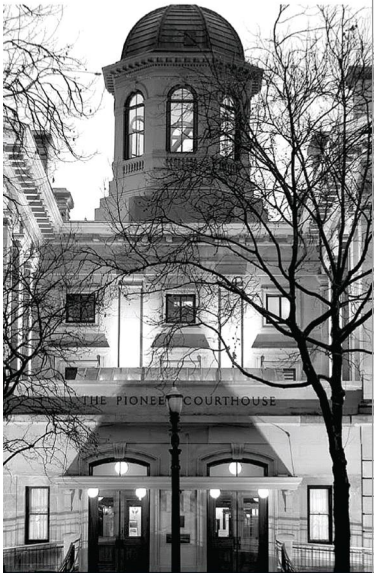
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA MAPLEY,

Plaintiffs,

v.

Cause No. CV 20-52-BLG-SPW

WATCHTOWER BIBLE AND TRACT SOCIETY
OF NEW YORK, INC., WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE MAPLEY SR.,

Defendants.

WATCHTOWER BIBLE AND TRACT SOCIETY
OF NEW YORK, INC.

Cross-Claimant,

v.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

REMOTE VIDEOTAPED DEPOSITION OF

CAMILLIA MAPLEY

TAKEN ON

AEDT: WEDNESDAY, NOVEMBER 30, 2022; 5:12 A.M.

MST: TUESDAY, NOVEMBER 29, 2022; 11:12 A.M.

WORKSPACES - LEVEL 5

171 COLLINS STREET

MELBOURNE, 3000 AUSTRALIA

1 there's two things going on.

2 **Q. You can elaborate.**

3 A. Well, it's Caekaert and Mapley.

4 **Q. Okay?**

5 A. So --

6 **Q. When you --**

7 A. -- what you're asking me is I can't recall
8 every single instance that occurred.

9 **Q. When your family joined the Hardin**
10 **Congregation, had Bruce Senior been sexually abusing**
11 **you for several years prior to that?**

12 A. Well, I don't recall, but I was a very
13 sexualized child, so I -- I don't recall.

14 **Q. What is the span of years over which you**
15 **claim Bruce Senior sexually abused you?**

16 A. Probably up until I was 14? Yeah.

17 **Q. Would that have been approximately 1982?**

18 A. Yeah.

19 **Q. And when did the sexual abuse start?**

20 A. I don't know.

21 **Q. How many years do you think the sexual**
22 **abuse went on?**

23 A. Well, if I just said 14, that sort of
24 gives you an idea.

25 **Q. Is it your belief that Bruce Senior**

1 **started sexually abusing you as soon as you were**
2 **born?**

3 **MR. SHAFFER:** Object to form. Asked and
4 answered.

5 **BY MR. SWEENEY:**

6 A. Yes.

7 **Q. Do you know if Bruce ever confessed to**
8 **anybody that he sexually abused you?**

9 A. Are you asking if he sat us down and
10 talked about abusing us?

11 **Q. We'll start there, so sure.**

12 A. Yes, then the answer is yes.

13 **Q. When did that happen?**

14 A. I don't know. After Gunner Hain was found
15 out.

16 **Q. Can you give me an approximate year?**

17 **MR. SHAFFER:** Object to form.

18 **BY MR. SWEENEY:**

19 A. '77? '78?

20 **Q. You had been about nine or ten?**

21 A. Yes, sorry. Sorry, I nodded.

22 **Q. And he -- who all did he sit down and**
23 **discuss this with?**

24 A. Himself, Shirley, Bruce Junior, Tracy and
25 myself.

1 A. Don't know.

2 Q. How did you know Gunner Haines?

3 A. He was in the congregation.

4 Q. When did Gunner pass away?

5 MR. SHAFFER: Object to form.

6 MR. SWEENEY: Let's clear that up, Ryan,
7 just so the record's clear. What exactly is your
8 objection?

9 MR. SHAFFER: Foundation. Speculation.
10 If you really want to find that information, it's in
11 the newspaper. I don't think it's a proper question
12 for this witness.

13 BY MR. SWEENEY:

14 Q. Cami, do you know when Gunner passed away?

15 A. No.

16 Q. Has it been more than ten --

17 A. I have a general idea, but --

18 Q. What is your general idea?

19 A. I don't know, Bruce Junior told me. I
20 don't know how long ago that was.

21 Q. What years do you claim Gunner abused you?

22 A. '77? '78?

23 Q. How many times did Gunner Haines abuse
24 you?

25 A. Once.